**Department of Energy**
Ohio Field Office
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, NY 14171-9799

November 8, 2004

Mr. Russell A. Mellor, President/Project Director
West Valley Nuclear Services Company
10282 Rock Springs Road
West Valley, NY 14171-9799

ATTENTION: W. M. Wierzbicki, Environmental Affairs Manager, WV-51

SUBJECT: Environmental Checklist OH-WVDP-2004-01, "Obsolete Building and Facility Dismantlement – Non-Radiological, Not RCRA Permitted"

REFERENCE: Letter (92662), W. M. Wierzbicki to T. J. Jackson, "Environmental Checklist OH-WVDP-2004-01, "Obsolete Building and Facility Dismantlement – Non-Radiological, Not RCRA Permitted," dated September 14, 2004

Dear Sir:

I have reviewed the subject Environmental Checklist and agree that the actions described therein are categorically excluded per Title10, Code of Federal Regulations Part 1021, Appendix B to Subpart D, CX B1.23, "Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces)."

Enclosed is a signed environmental checklist form.

The contents of this correspondence are not intended to impact or modify contract scope and/or cost. If you have any questions, please contact Daniel Sullivan on Extension 4016.

Sincerely,

T. J. Jackson, Acting Director
West Valley Demonstration Project

Enclosure: Environmental Checklist Form

cc: J. R. Craig, OH/OOM, w/o enc.
J. J. Hoch, WVNSCO, WV-51, w/enc.

DWS:92708 - 451.2

DWS/mls

File DWS

***REISSUED 10/26/04 to incorporate DOE comments.***

WVNSCO
West Valley Nuclear Services Company

10282 Rock Springs Road
West Valley, New York USA 14171-9799
Phone: (716) 942-2091/Fax: (716) 942-4117


Mr. T. J. Jackson, Acting Director
U. S. Department of Energy
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, NY 14171-9799

WV-51
WD:2004:0409
September 14, 2004

ATTENTION: D. W. Sullivan

Dear Mr. Jackson:

SUBJECT: Environmental Checklist OH-WVDP-2004-01, "Obsolete Building and Facility Dismantlement - Non-Radiological, Not RCRA Permitted"

REFERENCES:
1) WV-986, West Valley Nuclear Services Company, "Environmental Review Program," Revision 12, dated June 26, 2003

2) OH-6.1.01, U.S. Department of Energy, Ohio Field Office, Standard Operating Procedure, "National Environmental Policy Act Compliance," Revision 1, dated July 7, 1995

Attached for your review is Environmental Checklist OH-WVDP-2004-01, "Obsolete Building and Facility Dismantlement - Non-Radiological, Not RCRA Permitted" (Attachment A). The checklist has undergone environmental review in accordance with the West Valley Nuclear Services Company (WVNSCO) Environmental Review Program (Reference 1).

The proposed action evaluated in this checklist involves the dismantlement and subsequent disposal of obsolete buildings and/or facilities located at the West Valley Demonstration Project (WVDP).

A categorical exclusion (CX) is recommended for the proposed action. Dismantlement/disposal activities actions falls within the class of actions described in Title 10, Code of Federal Regulations (CFR) Part 1021, as Amended, Subpart D, Appendix B, CX B1.23, "Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces)" (Reference 2).

If you concur with this recommendation, please sign the attached Environmental Checklist, Section *D. RECOMMENDATION AND DETERMINATION.* If you have any comments or questions regarding the checklist, please contact J. J. Hoch of my staff at extension 2409.

EOS/BNM3569.JJH

(45.1.1)
92662

Very truly yours,

WEST VALLEY NUCLEAR SERVICES COMPANY

***Signature on File in Records***

W. M. Wierzbicki, Manager
Environmental Affairs

IB:2004:0087

WMW:JJH:bnm

Attachment: Environmental Checklist OH-WVDP-2004-01, "Obsolete Building and Facility Dismantlement - Non-Radiological, Not RCRA Permitted"

Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

| Project/Activity Title: Obsolete Building and Facility Dismantlement - Non-Radiological, Not RCRA Permitted | NEPA ID Number: OH-WVDP-2004-01 | Rev. #: 0 | Date: 08/13/2004 |
|---|---|---|---|
| Contractor Project Manager: D. E. Steffen | Phone Number: (716) 942-4344 | | |
| Contractor NEPA Coordinator: Jerald J. Hoch | Phone Number: (716) 942-2409 | | |
| OH/WVDP NEPA Document Manager: Daniel W. Sullivan | Phone Number: (716) 942-4016 | | |

**A. BRIEF PROJECT/ACTIVITY DESCRIPTION:** Attach a detailed description or statement of work.

---

**B. SOURCES OF IMPACT:** Would the action involve, generate, or result in changes to any of the following?

| | YES | NO | | YES | NO |
|---|---|---|---|---|---|
| 1. Air Emissions | X | | 12. Water Use/Diversion | | X |
| 2. Liquid Effluents | X | | 13. Water Treatment | X | |
| 3. Solid Waste | X | | 14. Water Course Modification | | X |
| 4. Radioactive Waste/Soil | X | | 15. Radiation/Toxic Chemical Exposures | X | |
| 5. Hazardous Waste | X | | 16. Pesticide/Herbicide Use | | X |
| 6. Mixed Waste | X | | 17. High Energy Source/Explosives | | X |
| 7. Chemical Storage/Use | | X | 18. Transportation | X | |
| 8. Petroleum Storage/Use | | X | 19. Noise Level | X | |
| 9. Asbestos | X | | 20. Workforce Adjustment | X | |
| 10. Utilities | X | | 21. Other | | X |
| 11. Clearing or Excavation | X | | | | |

In an attachment, qualify and explain each question that you have specifically answered "YES."

---

**C. CATEGORY EVALUATION CRITERIA:** Would the proposed action:

| | YES | NO |
|---|---|---|
| 1. Take place in an area of previous or ongoing disturbance? | X | |
| 2. Create hazardous, radioactive or mixed waste for which no disposal is available? | | X |
| 3. Impact a RCRA-regulated unit or facility? | | X |
| 4. Force a low income or ethnic minority population to shoulder a disproportionate share of the negative environmental impacts of pollution or environmental hazards because of a lack of political or economic strength? | | X |
| 5. Involve air emissions and be located in an air pollutant non-attainment or maintenance area for any criteria pollutants? | | X |
| 6. Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE and/or Executive Orders? (i.e., require any federal, state or local permits, approvals, etc.)? | | X |
| 7. Disturb hazardous substances, pollutants or contaminants that pre-exist in the environment such that there would be uncontrolled or unpermitted releases? | | X |
| 8. Require siting, construction, or major expansion of a waste storage, disposal, recovery, or treatment facilities, including such categorically-excluded facilities? | | X |
| 9. Adversely affect environmentally sensitive resources including, but not limited to: structures of archeological, historic or architectural significance; threatened or endangered species or their habitat; floodplains or wetlands; wildlife refuges, agricultural lands or vital water resources(e.g., sole-source aquifers)? | | X |
| 10. Involve extraordinary circumstances? As specified at 10 CFR § 1021.410(b)(2), extraordinary circumstances are unique situations presented by specific proposed actions, such as scientific controversy about the environmental effects of the action, uncertain effects or effects involving unique or unknown risks, or unresolved conflicts concerning alternate uses of available resources within the meaning of Section 102(2)(E) of NEPA [42 U.S.C. 4332(2)]. | | X |
| 11. Be "connected" to other actions with potentially significant impacts, related to other proposed actions with cumulatively significant impacts, and precluded by 40 CFR § 1506.1 or 10 CFR § 1021.211? | | X |

In an attachment, qualify and explain each question that you have specifically answered "YES."

U.S. Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

D. RECOMMENDATION AND DETERMINATION

**DOE OH/WVDP Director's Recommendation:** I find and recommend that this proposed action meets the criteria specified in 10 CFR § 1021, Subpart D, and/or DOE Policy and Guidance for the following:

[ X ] Categorical Exclusions (Appendix B, Class of Action B1.23 )
[ ] Actions Within the Scope of Existing NEPA Documentation
(NEPA Document ID Number _____)
[ ] *On-going Operations* (Standard Operating Procedure OH-6.1.01, Rev. 1, Section 5.2)

Signature: _____ Date 11/5/04
Director, Ohio Field Office,
West Valley Demonstration Project (OH/WVDP),
Department of Energy

**DOE OH/WVDP NEPA Compliance Officer's Determination:** Based on my review of the attached information concerning this proposed action, as the OH/WVDP NEPA Compliance Officer (DOE Order 451.1A, Section 5.d.), I have determined that the proposed action fits within the specified class of actions, that the other regulatory requirements identified in Section C are met, and that this proposed action proceed without further NEPA review.

Signature: _____ Date 11/4/2004
OH/WVDP NEPA Compliance Officer,
West Valley Demonstration Project

**OR**

[ ] Environmental Assessments (Appendix C, Class of Action _____; or Action not listed in Subpart D)
[ ] Environmental Impact Statements (Appendix D, Class of Action _____)
[ ] Interim Actions (40 CFR § 1506.1 and 10 CFR § 1021.211)
[ ] Integrated Documentation for CERCLA/RCRA Actions
[ ] Variances (Emergency Action, 40 CFR § 1506.11 and 10 CFR § 1021.343)

**DOE-OH NEPA Compliance Officer's Concurrence:** I concur with the recommendation that this proposed action fits within the specified class of actions.

Signature: _____ Date _____
NEPA Compliance Officer,
Ohio Field Office,
Department of Energy

**DOE-OH Manager's Determination:** Based on my review of the attached information concerning this proposed action, as the Head of the Ohio Field Office (DOE Order 451.1A, Section 5.a.), I have determined that the level of documentation recommended for the proposed action is appropriate.

Signature: _____ Date _____
Manager, Ohio Field Office,
Department of Energy

## SECTION A. BRIEF PROJECT/ACTIVITY DESCRIPTION:

### BACKGROUND

From 1966 to 1972, Nuclear Fuel Services, Inc. (NFS), operated a nuclear fuel reprocessing plant at the Western New York Nuclear Service Center (WNYNSC) near West Valley, New York . The plant, which reclaimed uranium and plutonium from spent nuclear fuel, generated approximately 600,000 gallons of liquid high-level radioactive waste (HLW), which was stored in underground tanks.

In 1980, Congress passed the West Valley Demonstration Project (WVDP) Act, which directed the U. S. Department of Energy (DOE) to do the following: (1) solidify the HLW at the WNYNSC in a form suitable for transportation and disposal; (2) develop containers for the HLW that are suitable for permanent disposal; (3) transport the solidified HLW, in accordance with applicable provisions of law, to an appropriate Federal repository for permanent disposal; (4) in accordance with applicable licensing requirements, dispose of low-level radioactive waste (LLW) and transuranic (TRU) waste produced as a result of solidifying the HLW; and (5) decontaminate and decommission – (a) the tanks and other facilities of the WNYNSC in which the HLW solidified under the Project is stored; (b) the facilities used in the solidification of the waste; and (c) any material and hardware used in connection with the Project, in accordance with requirements that the Nuclear Regulatory Commission (NRC) prescribes (Public Law 96-368).

In 1982, a Final Environmental Impact Statement (EIS) and associated Record of Decision (ROD) were issued for the actions that DOE proposed to satisfy the first two requirements of the WVDP Act (DOE/EIS-0081). During the first phase of the WVDP, which was completed in September 2002, the HLW was immobilized in borosilicate glass through vitrification. The canisters of immobilized HLW are currently being stored on-site until DOE authorizes their removal. In 1993 and 1998, the DOE prepared Supplement Analyses of the 1982 Final EIS to re-examine on-going HLW solidification activities as well as other refinements to the actions originally evaluated in the EIS (DOE-EIS-025 and WVDP-321, respectively). As a result of both analyses, DOE concluded that no environmentally relevant or substantial changes in Project scope had occurred, that no new circumstances or relevant information existed, and that the environmental analyses performed for the 1982 EIS were still valid.

## TYPE AND SCOPE OF ACTIVITY

The proposed action evaluated in this environmental checklist involves dismantling buildings and/or facilities that have served their useful purpose and are no longer required. These buildings and/or facilities are located in non-radiological areas and are anticipated to be radiologically clean. While it is not anticipated to be present, any residual radiological contamination remaining on foundation pads will be decontaminated to levels meeting the unrestricted release limits in Table 2-2 of WVDP-010, "Radiological Controls Manual" or sealed using fixative or other appropriate means, pending development of the appropriate Derived Concentration Guidelines (DCGLs) for WVDP decommissioning. These buildings are not RCRA permitted, however, some buildings had Solid Waste Management Units (SWMUs) for storage of wastes. Table 1 lists the buildings and facilities included in this checklist broken down by Waste Management Areas (WMA). This list is not all inclusive. Additional buildings of similar type, located in non-radiological areas, and are not RCRA permitted may be added in the future and supplemental environmental review will be performed.

**Table 1**

| Area | Building/Facility | Construction Type | Footprint (Sq Ft) | Stories | Regulatory Status |
|---|---|---|---|---|---|
| WMA 1 *(Refer to Figure 1)* | Emergency Vehicle Shelter | Metal | 693 | 2 | None |
| | Fire Pump House | Metal | 487 | 1 | None |
| WMA 2 *(Refer to Figure 2)* | Test & Storage Building | Metal | 9,600 | 2 | SWMU |
| | Vitrification Test Facility | Metal | 6,250 | 4 | SWMU |
| | Maintenance Shop | Metal | 10,000 | 2 | SWMU |
| | Maintenance Storage Area | Metal | 2,860 | 2 | None |
| | Vehicle Repair Shop | Metal | 1,410 | 2 | None |
| | Lube Storage Locker | Prefab | 324 | 1 | None |
| WMA 3 *(Refer to Figure 3)* | Cold Chemical Facility | Metal | 1,900 | 3 | None |
| WMA 6 *(Refer to Figure 4)* | Old Warehouse | Metal | 12,065 | 3 | None |
| | WTF Training Platforms | Prefab | 800 | 8 | None |
| | Road-salt & Sand Shed | Metal | 625 | 2 | None |

Table 1 (cont.)

| Area | Building/Facility | Construction Type | Footprint (Sq Ft) | Stories | Regulatory Status |
|---|---|---|---|---|---|
| WMA 10 *(Refer to Figure 5)* | New Warehouse | Metal | 19,637 | 4 | SWMU |
| | OB-1 Office Building | Metal | 9,800 | 1.5 | None |
| | Fabrication Shops | Metal | 4,800 | 1 | SWMU |
| | Diesel Fuel Oil Building | Metal | 334 | 1 | None |
| WMA 11 *(Refer to Figure 6)* | Bulk Storage Warehouse | Metal | 13,000 | 2 | None |
| | School House | Wood | 800 | 1 | SWMU |

The scope of the proposed action includes:

- Dismantling the building and/or facility along with its appurtenant structures. When practical buildings will be disassembled. If demolition is required, common methods will be utilized, including, but not limited to grapples, masonry saw, ultra high pressure water jet, drilling and expansion cracking, water-cooled track saw, etc;
- Segregating and packaging the resultant debris and waste(s);
- Asbestos removal activities;
- Disposing of the debris and packaged waste; and
- Removal and disposal of asphalt and concrete from parking lots, roadways, and walkways will be completed as needed. Areas will be regraded and seeded to match natural contours.

At this time, the removal of the building foundations is not anticipated; however, if it is determined that removal is required, the following activities would be included in this scope:

- Removal of the building foundations;
- Backfill and grade to match the contours of the surrounding area;
- Revegetate as needed to prevent erosion.

Note: Solid Waste Management Units (SWMUs) will be required to be closed by the appropriate agency (or agencies) in accordance with the requirements determined under the Corrective Action Programs of RCRA.

The following activities will be performed as applicable prior to the scope of this checklist utilizing the Site-Wide Routine Maintenance Activities Checklist (OH-WVDP-2003-03) for NEPA coverage:

- Visual inspection and sampling, if necessary, of the structures to be dismantled;
- Pre-demolition asbestos survey;
- Permanent closure of tanks registered as Petroleum Bulk Storage or Hazardous Substance Bulk Storage in accordance with 6 NYCRR 613.9 and 598.10, respectively.
- Isolating and removal of equipment, instrumentation, and other building contents

## PURPOSE AND NEED

The WVDP Act requires DOE to decontaminate and decommission any material and hardware used in connection with the WVDP (Public Law 96-368). The DOE utilized these facilities/buildings during the course of the Project.

## SCHEDULE/TIMING

Dismantlement of the Facilities/Buildings shown in Table 1 will be scheduled when final determination of no further need is made. The length of time to complete dismantlement would vary with each specific facility.

## SECTION B. SOURCES OF IMPACT:

**1. Air Emissions** - There would be minor CO and $CO_2$ air emissions generated from the construction equipment used to perform dismantlement activities at the WVDP. Typically, this equipment includes trucks, excavators, front-end loaders, cranes, and aerial lifts. These emissions would occur intermittently throughout the work shift. Fugitive dust could be generated during dismantlement activities. Such dust would be controlled as necessary to minimize impact. If encountered, worker exposure to airborne radioactive contaminants would be controlled in accordance with the requirements specified in the WVDP Radiological Controls Manual (WVDP-010) and Industrial Hygiene and Safety Manual (WVDP-011)(See Section **B.15. Radiation/Toxic Chemical Exposure**).

**2. Liquid Effluents** - If the foundations are removed or soil will be otherwise disturbed, sediment and erosion controls would be implemented to prevent impact from storm water run-off. (See Section **B.11. Clearing and Excavation**). In order to control dust during dismantling activities, water spraying may be required. Controls would be implemented to prevent impacts from the water run-off. Liquids generated from pressure jets and/or water cooled sawing will be collected and treated for discharge through existing site treatment facilities.

**3. Solid Waste** - Demolition debris would result from dismantling of the buildings/facilities and their appurtenant structures. The debris would consist of primarily metal, wood, and concrete. Efforts will be made to segregate materials to optimize recycling and/or reuse opportunities. Solid wastes generated as a result of this activity would be characterized and disposed of in accordance with WV-227, "Planning for Waste Treatment, Storage and Disposal," Standard Operating Procedure (SOP) 300-07, "Waste Generation, Packaging, and On-Site Transportation," and SOP 09-02, "Solid Waste Management and Material Reuse and Recycling," Section 5.2, "Construction and Demolition Debris Disposal." Section **B.4. Radioactive Waste/Soil** addresses the disposal of radioactive waste generated as a result of the proposed action.

**4. Radioactive Waste/Soil** - The amount of radioactive waste generated as a result of the proposed action, if any, would be minimal (e.g. anti-Cs, gloves, wipes, and swipes). Radioactive waste generated as a result of the proposed action would be classified and disposed of in accordance with WV-227, "Planning for Waste Treatment, Storage and Disposal", and WVDP-238, "Low-level Radioactive Waste Classification Program Plan."

While no excavation is anticipated in areas suspected to be radioactively contaminated, if encountered, WVDP Site Radiation Protection personnel would assist in developing specific work plans to minimize the potential for encountering contaminated media. The excavated soil would be screened for radioactive contamination. If contaminated water or soils were encountered, they would be characterized according to SOP 300-07, "Waste Generation, Packaging, and On-Site Transportation." Any contaminated soils must be packaged in accordance with SOP 300-26, "Off-Site Transportation of Waste and Hazardous Materials."

**5. Hazardous Waste** - As identified in Table 1, some buildings are considered part of Solid Waste Management Units (SWMU) under the Resource Conservation and Recovery Act (RCRA). Those buildings that are identified as SWMU's are expected to ultimately receive a "No Further Action" (NFA) disposition from the regulatory agency(ies). Should an NFA not be received based on building demolition and dismantlement activities, the regulatory agency(ies) may require additional SWMU evaluation under the RCRA 3008(h) Consent Order.

Based upon the logic sequence of closure (i.e. removal of building contents and decontamination prior to dismantlement and demolition), it is unlikely to discover additional hazardous wastes. However should any hazardous wastes be discovered during building dismantlement and demolition, they must be managed according to the hazardous waste regulations and site procedures for hazardous waste management.

**6. Mixed Waste** - Based upon the logic sequence of closure (i.e. removal of building contents and decontamination prior to dismantlement and demolition), it is unlikely to discover additional mixed wastes. However, should any mixed wastes be discovered during building dismantlement and demolition, they must be managed according to the hazardous waste regulations and site procedures for mixed waste management and identified in the WVDP Site Treatment Plan and Consent Order.

**9. Asbestos** - Table 2 lists the known asbestos in these buildings. However, a building demolition survey of each facility must be conducted prior to commencement of dismantlement per the requirements of 12 NYCRR § 56-1.9, "Building demolition survey," Sections (a) through (e).

If necessary, asbestos would be abated in accordance with 12 NYCRR Part 56, "Asbestos," as amended November 9, 1994, and approved site specific variances; 29 CFR 1926.1101, "Asbestos;" 40 CFR 61, Subparts A & M, "National Emission Standards for Hazardous Air Pollutants".

All personnel who perform asbestos related activities must hold current NYS Department of Health certified training for the specific class of work to be completed. This training requires an annual refresher. All asbestos workers and engineers must also have a valid NYSDOL asbestos handlers certification.

All identified asbestos containing materials would be handled, packaged, and disposed in compliance with federal and state regulations, DOE Orders, and the WVDP Asbestos Management Plan (WVDP-072) as implemented by contractor procedures. Projects involving greater than 25 linear feet or 10 $ft^2$ of asbestos would be reviewed for State and/or Federal notification requirements. In accordance with 40 CFR Part 61.145, the U.S. Environmental Protection Agency (EPA) would be notified at least ten (10) days prior to commencing the dismantlement activities. Asbestos waste would be sent to a properly permitted solid waste landfill for disposal except if radioactively contaminated, in which case would be managed as discussed above in Section B.4, Radioactive Waste/Soil.

**Table 2**

| Building/Facility | Area | Type of Material | Quantity |
|---|---|---|---|
| Emergency Vehicle Shelter | None Identified | | |
| Fire Pump House | Central Area | Pipe Insulation | 55 lf |
| Test & Storage Building | Vit Cold Lab<br>Tool Crib (east side)<br>Restroom | Pipe Insulation<br>Fire Proofing<br>Pipe Insulation | 2 lf<br>20 lf<br>20 lf |

Table 2 (cont.)

| Building/Facility | Area | Type of Material | Quantity |
|---|---|---|---|
| Vitrification Test Facility | None Identified | | |
| Maintenance Shop | None Identified | | |
| Maintenance Storage Area | None Identified | | |
| Vehicle Repair Shop | None Identified | | |
| Lube Storage Locker | None Identified | | |
| Cold Chem Facility | None Identified | | |
| Old Warehouse | None Identified | | |
| WTF Training Platforms | None Identified | | |
| Road-salt & Sand Shed | None Identified | | |
| New Warehouse | None Identified | | |
| OB-1 Office Building | None Identified | | |
| Fabrication Shops | None Identified | | |
| Diesel Fuel Oil Building | None Identified | | |
| Bulk Storage Warehouse | Boiler Room<br>Generator Room | Gasket Material<br>Joint Compound | 1 sf<br>1 lf |
| School House | None Identified | | |

**10. Utilities** - In conjunction with the use of record drawings of underground utilities within the WNYNSC, an electronic line locator would be used to locate underground utilities. These locations are then marked on the ground. Excavation by hand instead of using powered excavation equipment would take place within two feet of a known underground utility.

**11. Clearing and Excavation** - No contaminated soil is anticipated to be encountered during this proposed activity based on historical knowledge of the areas around the buildings/facilities listed in Table 1. If contaminated soil were encountered, it would be managed in accordance with WVDP-304, "Technical Basis for Contaminated Soil Management."

**13. Water Treatment** - Liquid effluents generated as a result of the proposed action **(See Section B.2. Liquid Effluents)** would be characterized and treated in accordance with WVDP-287, "Data Collection Plan for Characterization of the State Pollution Discharge Elimination System Source Waste Streams," SOP 300-07, "Waste Generation, Packaging, and On-Site Transportation," and SOP 300-15, "Disposition of Liquid Waste to the Interceptor." The liquid waste would be disposed of in accordance with NYSDEC SPDES permit requirements.

**15. Radiation/Toxic Chemical Exposure** - If encountered, individual exposures would depend on the duration of the dismantlement activities and the proximity of workers to the contaminated area. All exposures would be maintained as low as reasonably achievable (ALARA) and in compliance with applicable state and federal regulations and DOE Orders, as implemented by WVDP-010, "Radiological Controls Manual." Worker exposure would be limited by guidance provided in the WVDP Radiological Controls Manual, WVDP Industrial Hygiene and Safety Manual (WVDP-011), and SOP 15-14, "Entry Into and Exit From Contaminated Areas." The individual dose to workers would not exceed the administrative control limits in WVDP-010, "Radiological Controls Manual."

**18. Transportation** - Waste containers will be transported on-site in accordance with SOP 300-07, "Waste Generation, Packaging and On-site Transportation." Before any radioactive waste container could be transported off-site, it will meet the packaging requirements for radioactive materials set forth in 49 CFR Part 173, "Subpart I - Radioactive Materials," and 10 CFR Part 71, "Packaging and Transport of Radioactive Material." All waste shipments would be in accordance with the requirements for shipments specified in 49 CFR Part 100 - 177, "Transportation," and 6 NYCRR Part 381, "Transporters of Low-Level Radioactive Waste."

**19. Noise Level** - Increased noise levels would result from the dismantlement of buildings. Building-demolition noise tends to be broad band and continuous. It results from cutting metal and concrete as well as operating cranes and other diesel-powered equipment. The noise levels would be of short duration and probably would not exceed 85 dB(A) TWA (decibel level measured on the A scale as a time weighted average over an eight-hour day). Applicable federal and state regulations and DOE Orders, as implemented by contractor safety procedures, would be observed during activities expected to generate elevated noise levels.

**20. Workforce Adjustment** - The proposed action would be performed by both the WVDP workforce and commercial vendor(s). The workforce adjustments would not require an upgrade or expansion of any existing site utilities or services (e.g., office space, break areas, restrooms).

## SECTION C. CATEGORY EVALUATION CRITERIA:

### 1. Take place in an area of previous or on-going disturbance?

The proposed action would take place in an area of previous or on-going disturbance (**Figures 1-9**).

## SECTION D. RECOMMENDATION AND DETERMINATION:

A categorical exclusion (CX) is recommended for the proposed action. Dismantlement and subsequent disposal of the listed buildings/facilities falls within the class of actions described in 10 CFR § 1021, Subpart D, Appendix B, CX B1.23, "Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces)."

There are no extraordinary circumstances related to the proposed action that would affect the significance of the action, and the action is not "connected" to other actions with potentially or cumulatively significant impacts (40 CFR § 1508.25(a)(1) and (2), respectively). Dismantling these buildings is not an interdependent part of the EIS for WVDP completion; that is, the proposed action does not depend on the EIS for justification. The WVDP Act requires DOE to decontaminate and decommission any material and hardware used in connection with the WVDP (Public Law 96-368), regardless of the outcome of the EIS for WVDP completion. As such, these dismantling efforts would not prejudice the results of the EIS for WVDP completion — that is, proceeding with these dismantlements would not bias nor preclude DOE from implementing any of the EIS alternatives. Likewise, the action would not trigger other actions that require an EIS and could proceed without other actions taking place previously or simultaneously.

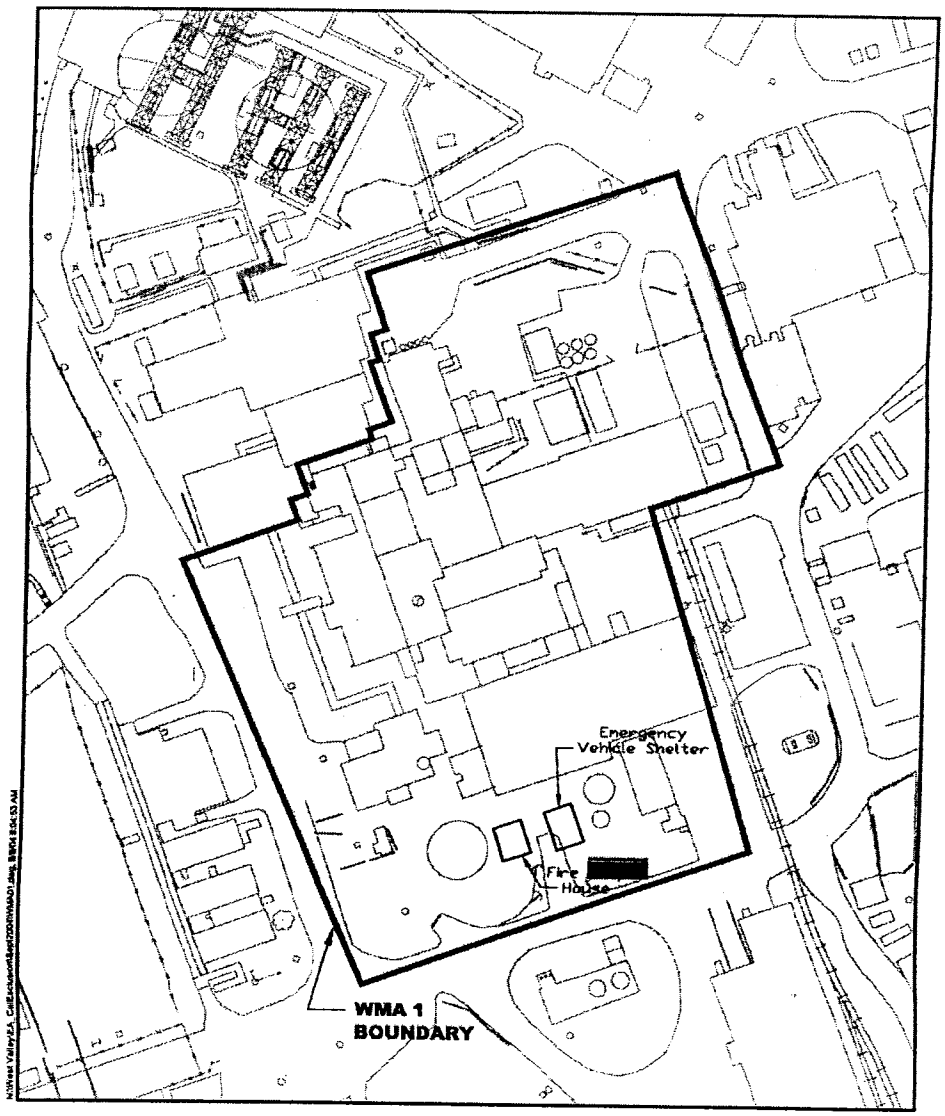
## SUPPORTING DOCUMENTS

| | |
|---|---|
| DOE and NYSERDA | "Cooperative Agreement between United States Department of Energy and New York State Energy Research and Development Authority on the Western New York Nuclear Service Center at West Valley, New York," effective October 1, 1980, as amended September 18, 1981 |
| DOE-EIS-025 | U. S. Department of Energy, "Supplement Analysis of Environmental Impacts Resulting from Modifications in the West Valley Demonstration Project," dated September 7, 1993 |
| DOE/EIS-0081 | U.S. Department of Energy, "Final Environmental Impact Statement: Long-Term Management of Liquid High-Level Radioactive Wastes Stored at the Western New York Nuclear Services Center, West Valley," dated June 1982 |
| DOE/EIS-0337-D | U. S. Department of Energy, "West Valley Demonstration Project Waste Management," dated April 2003 |
| DOE Order 430.1B | U. S. Department of Energy, "Real Property Asset Management," dated September 24, 2003 |
| DOE Order 435.1 | U. S. Department of Energy, "Radioactive Waste Management," dated August 28, 2001 |
| DOE Order 451.1B | U. S. Department of Energy, "National Environmental Policy Act Compliance Program," dated September, 2001 |
| 10 CFR Part 1021 | U. S. Department of Energy, "National Environmental Policy Act Implementing Procedures; Final Rule," dated July 9, 1996 |
| 40 CFR 61.140-156 | U.S. Environmental Protection Agency, Subpart M, "National Emission Standard for Asbestos," as amended, dated February 12, 1999 |
| 40 CFR Parts 1500 -1508 | U. S. Council on Environmental Quality, "Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act," dated July 1, 1986 |

| | |
|---|---|
| 42 U.S.C. 4321 *et seq.* | U.S. Congress, National Environmental Policy Act, as Amended, dated January 1, 1970 |
| Public Law 96-368 | U.S. Congress, West Valley Demonstration Project Act (S.2443), dated October 1, 1980 |
| OH-WVDP-2003-03 | Environmental Checklist (DW:2004:0009), "Site-Wide Routine Maintenance Activities" dated January 12, 2004 |
| 6 NYCRR Part 370 | Hazardous Waste Management System - General |
| 6 NYCRR Part 373-1 | Hazardous Waste Treatment, Storage and Disposal Facility Permitting Requirements |
| 6 NYCRR Part 373-2 | Final Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities |
| 6 NYCRR Part 373-3 | Interim Status Standards for Owners and Operators of Hazardous Waste Facilities |
| 12 NYCRR Part 56 | State of New York, Department of Labor, "Asbestos," as amended, November 9, 1994 |
| SOP OH-6.1.01 | Ohio Field Office, "National Environmental Policy Act Compliance," revision 1, dated July 7, 1995 |
| WV-227 | West Valley Demonstration Project, "Planning for Waste Treatment, Storage and Disposal," revision6, dated July 7, 2004 |
| WVDP-010 | West Valley Demonstration Project, "Radiological Controls Manual," revision 20, dated March 2, 2004 |
| WVDP-011 | West Valley Demonstration Project, "WVDP Industrial Hygiene and Safety Manual," revision 18, dated June 19, 2003 |
| WVDP-072 | West Valley Nuclear Services Company, "Asbestos Management Plan," revision 5, FC2, dated December 6, 2002 |
| WVDP-238 | West Valley Nuclear Services Company, "Low-level Radioactive Waste Classification Program Plan," revision 0, dated August 2,1996 |
| WVDP-304 | West Valley Demonstration Project, "Technical Basis for Contaminated Soil Management," revision 1, dated March 2, 1999 |

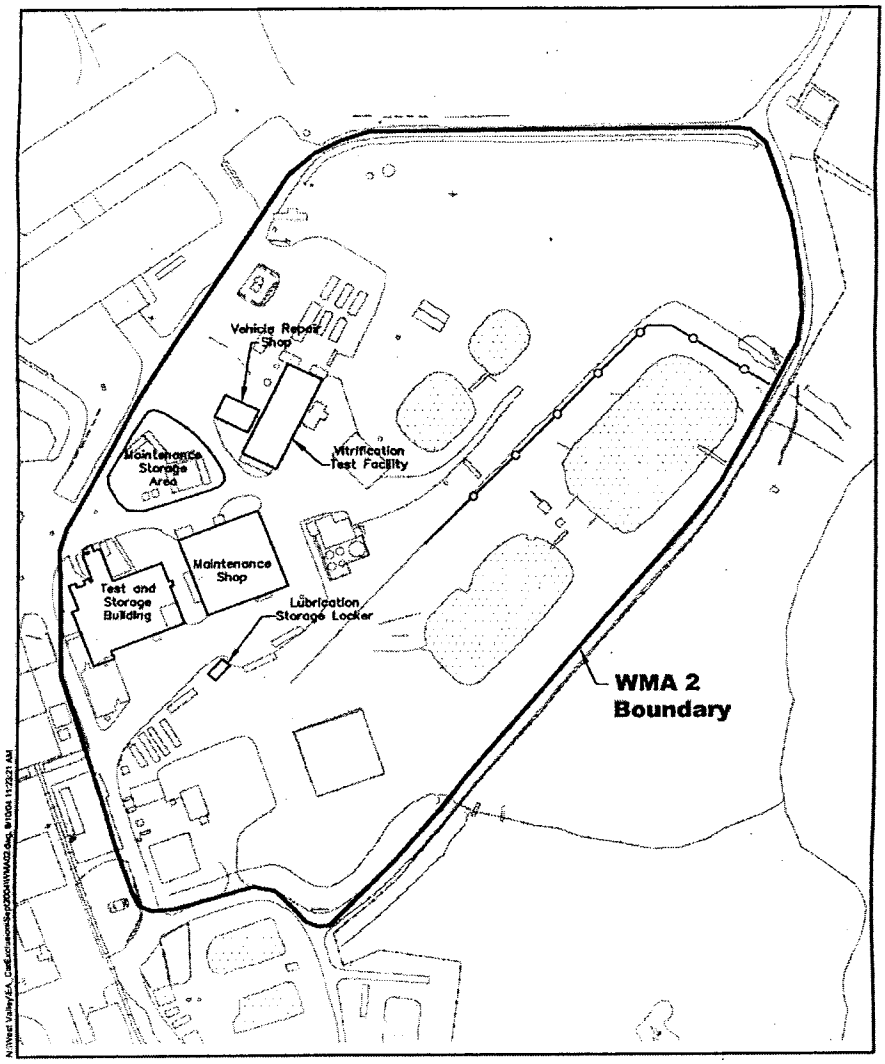
| | |
|---|---|
| WVDP-321 | West Valley Demonstration Project, "Supplement Analysis II of Environmental Impacts Resulting from Modifications in the West Valley Demonstration Project," dated June 23, 1998 |
| SOP 09-02 | West Valley Nuclear Services Company, "Solid Waste Management and Material Reuse and Recycling," revision 5, dated May 9, 2002 |
| SOP 15-14 | West Valley Nuclear Services Company, "Entry Into and Exit From Contaminated Areas," revision 18, dated May 24, 2004 |
| SOP 15-44 | West Valley Nuclear Services Company, "Asbestos Removal - Minor Projects," revision 6, dated May 21, 2002 |
| SOP 300-07 | West Valley Nuclear Services Company, "Waste Generation, Packaging, and On-Site Transportation," revision 24, dated June 14, 2004 |
| SOP 300-26 | West Valley Nuclear Services Company, "Off-Site Transportation of Waste and Hazardous Material," revision 5, dated March 23, 2004 |

## Figure 1



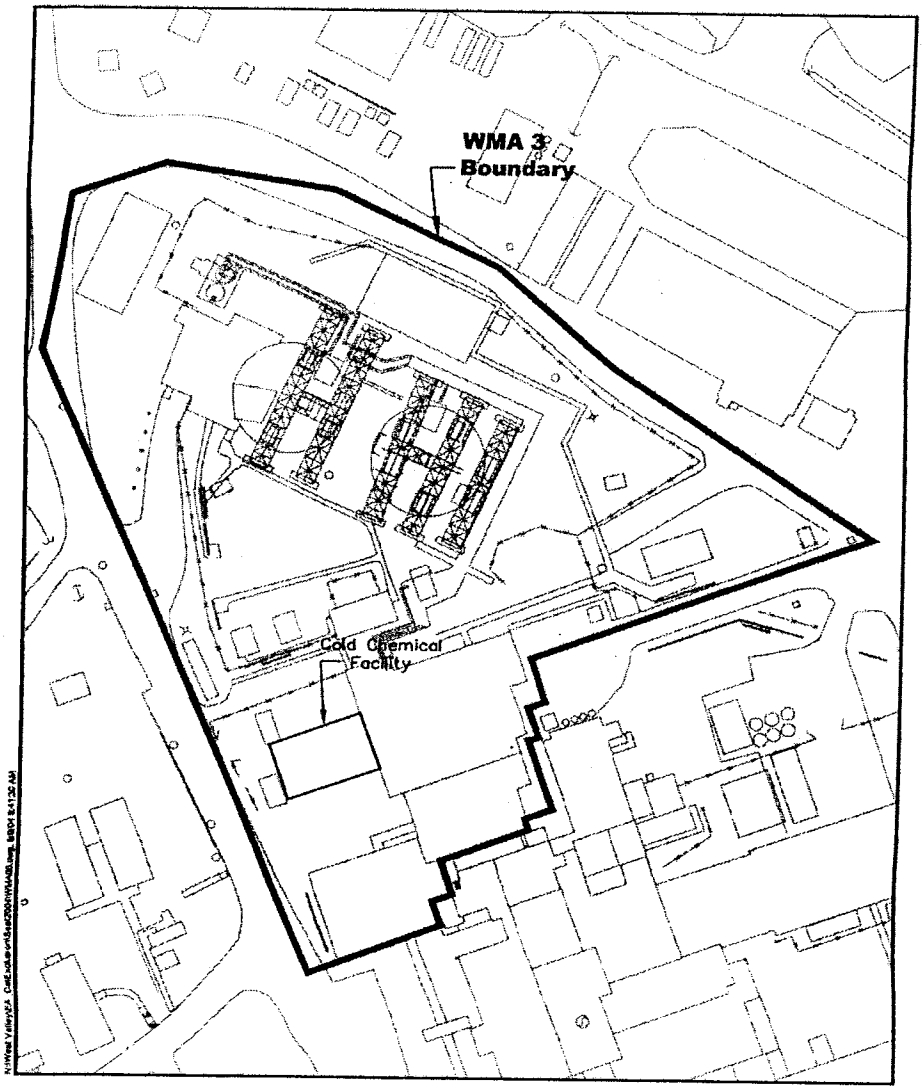

WMA 1-Process Building Area

## Figure 2



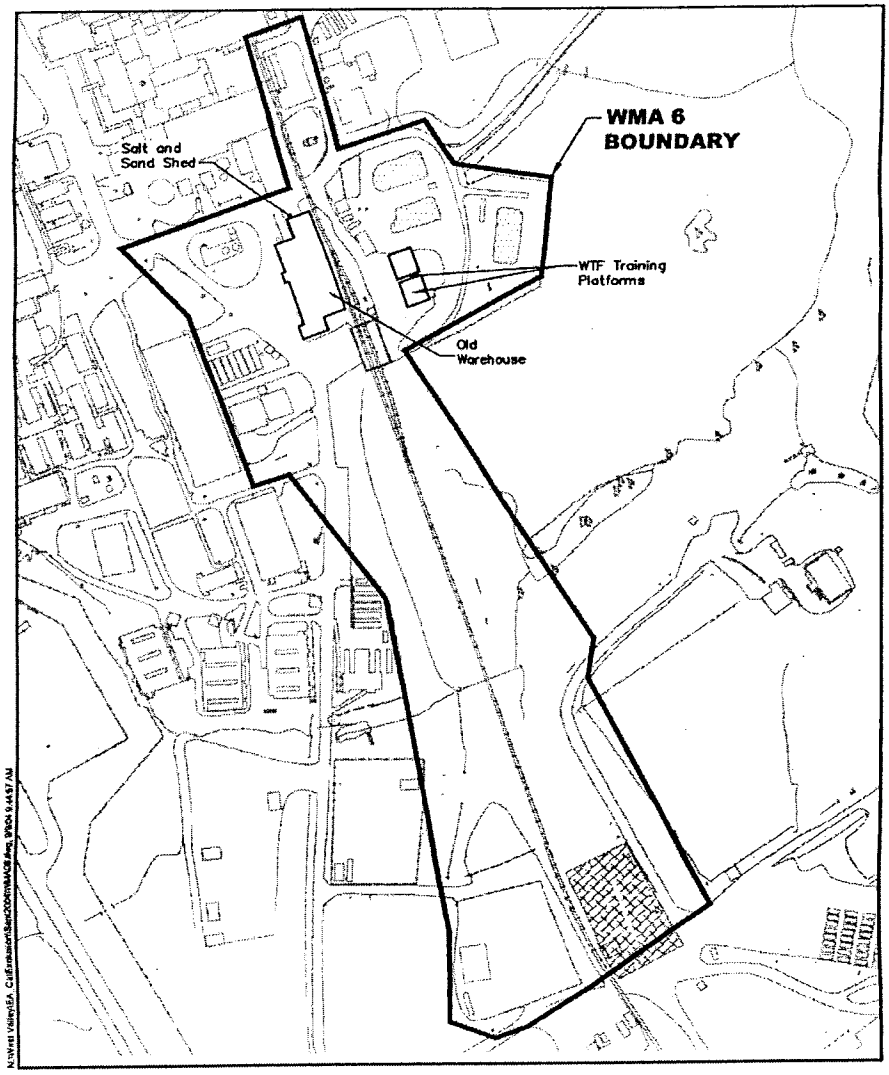

WMA 2 - Low-Level Waste Treatment Facility Area

## Figure 3



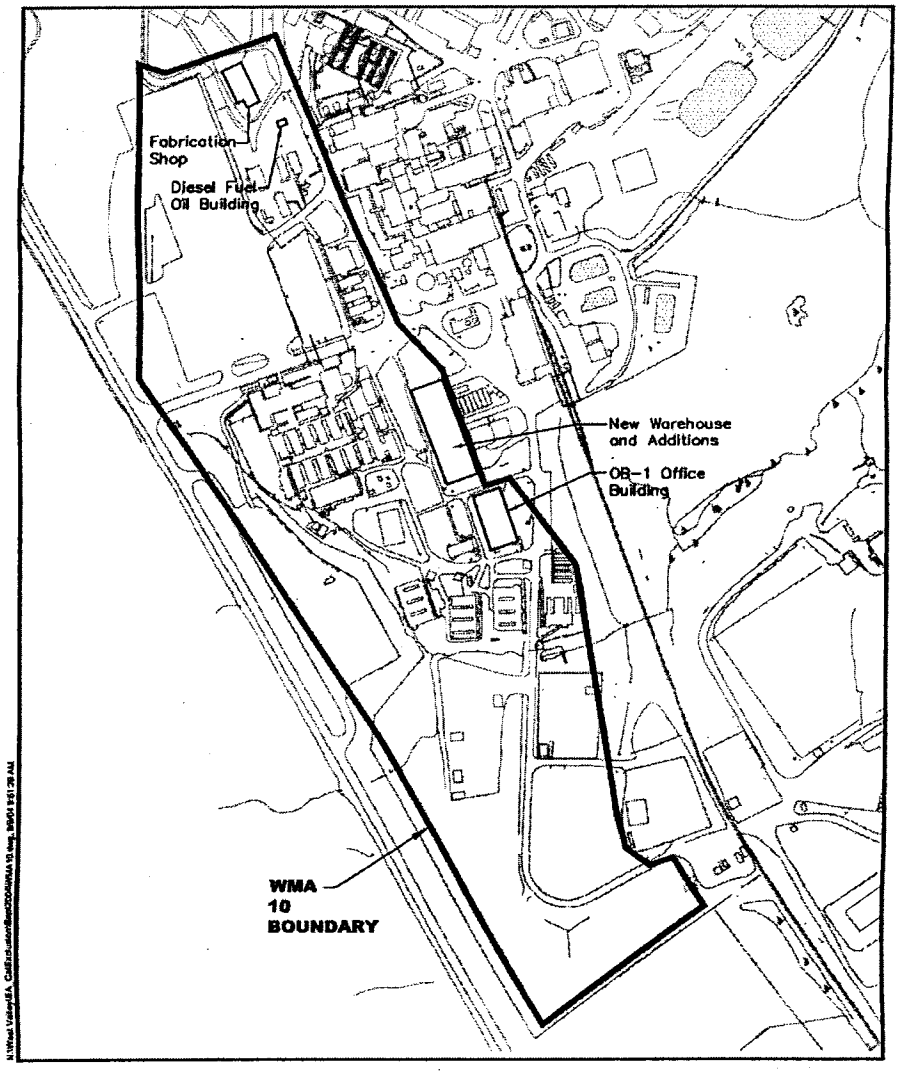

WMA 3 - HLW Storage and Vitrification Facility Area

## Figure 4



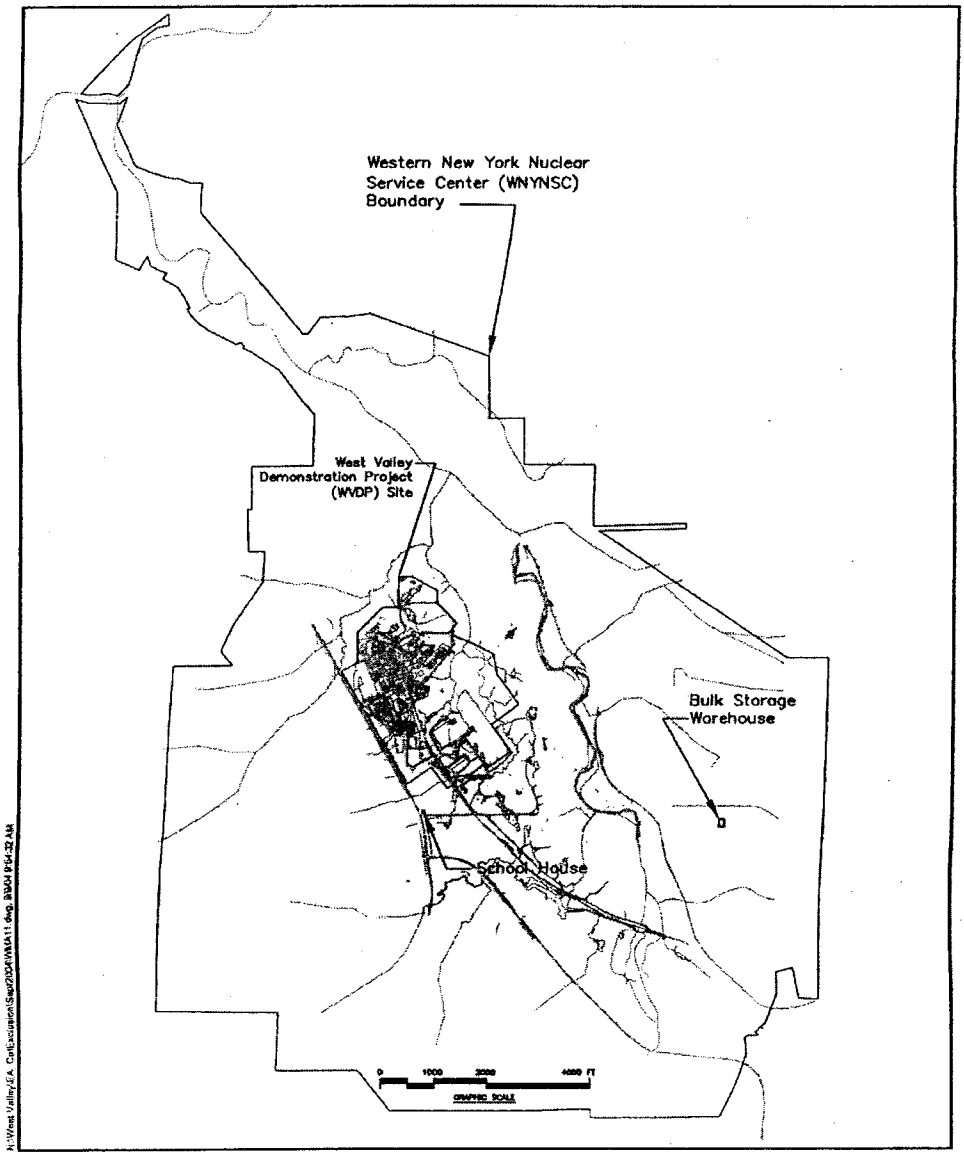

WMA 6 - Central Project Premises

## Figure 5




WMA 10 - Support and Services Area

## Figure 6




WMA 11 - Bulk Storage Warehouse Area